

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re:	§	Chapter 11
	§	
Entrada Development, LLC	§	Case No. 23-10317
	§	
Debtor	§	

DEBTOR’S APPLICATION TO EMPLOY THE SMEBERG LAW FIRM, PLLC

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Entrada Development, LLC ("Entrada" or "Debtor"), and Debtor-in-Possession, respectfully makes this application (the "Application") to employ counsel, representing as follows:

1. On May 2, 2023, Debtor filed a petition under Chapter 11 of Title 11 of the United States Code (the "Case").
2. Debtor has continued in possession and management of its property as Debtor-in-Possession.
3. In connection with the performance of its duties and obligations as Debtor-in-Possession, the Debtor requests authority to employ Ronald J. Smeberg and The Smeberg Law Firm, PLLC ("Smeberg Law Firm") as Debtor’s attorneys under a general retainer, to give the Debtor legal advice with respect to the Case, the Debtor’s powers and duties as Debtor-in-Possession and management of the Debtor’s property, and to perform all legal services for the Debtor-in-Possession that may be necessary herein at their regular hourly rates.
4. Applicant has selected Ronald J. Smeberg at Smeberg Law Firm because of his experience and knowledge in the field of Debtor’s rights under the United States Bankruptcy Code. During the course of preparing for this Chapter 11 case, Mr. Smeberg has prepared the initial pleadings on behalf of the Debtor, has gained experience as to the Debtor’s property, and has

become familiar with many of the pertinent legal issues which may arise in the context of the Debtor's Chapter 11 case. Accordingly, Debtor believes said attorneys are well qualified to represent the Debtor, as Debtor-in-Possession, in this proceeding. Furthermore, it is necessary for Debtor, as Debtor-in-Possession, to employ attorneys for such professional services

5. Current hourly billing rates for Smeberg Law Firm for Debtor is:

- Ronald J. Smeberg and Attorneys with six or more years of experience - \$400.00
- Associate Attorneys - \$275.00
- Legal Assistants/Paralegals - \$140.00
- Accounting Professionals Employed by Smeberg Law Firm that are licensed CPAs or have twenty-five or more years of experience - \$225.00

6. In compliance with 11 U.S.C. § 329 and Rule 2014, Smeberg Law Firm has attached a declaration as Exhibit "A" detailing the connections with the Debtor or any party-in-interest. To the extent Exhibit "A" discloses any connection, Debtor believes it is not sufficient to prohibit employment of SLF as counsel.

Reimbursement of Expenses

7. The debtor has been advised by Smeberg Law Firm that disbursements for expenses are not included in Smeberg Law Firm's hourly rates and will be separately billed as expenses of this proposed engagement. Such disbursements for expenses may include, without limitation, charges for photocopying, courier services, document retrieval costs, printing, computer-assisted legal research, postage, long-distance phone calls, telecopies, deposition fees, filing fees, witness fees, subpoena fees, parking fees, tolls, travel expenses (including mileage), and any fees for outside contract services. In certain cases, charges are set by the service providers or outside

contractors and, in other cases, Smeberg Law Firm establishes a customary charge. Smeberg Law Firm will charge the actual cost of these expenses in a manner and at rates consistent with charges made to Smeberg Law Firm's other clients.

Statement of Disinterestedness

8. Based on the declaration of Ronald J. Smeberg, attached as Exhibit "A" ("Declaration of Proposed Attorney and Disclosure of Compensation"), Debtor believes Smeberg Law Firm is a "disinterested person" as that term is defined by 11 U.S.C. § 101(14). Other than set forth in this Application and Declaration of Proposed Attorney and Disclosure of Compensation, Smeberg Law Firm has no connections with the Debtor, creditors, any other party-in-interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, and has no interest adverse to the Estate that would disqualify Smeberg Law Firm from employment.

WHEREFORE, Debtor hereby requests that it be authorized to employ Ronald J. Smeberg and The Smeberg Law Firm, PLLC under a general retainer, to represent the Debtor as Debtor-in-Possession in this bankruptcy proceeding under Chapter 11 of Title 11 of the United States Code, and that the Debtor has such other and further relief as is just.

Dated: May 16, 2023

Respectfully Submitted,

By: /s/ Michel Dixon
Entrada Development, LLC

THE SMEBERG LAW FIRM, PLLC

By: /s/ Ronald J. Smeberg
RONALD J. SMEBERG
State Bar No. 24033967
THE SMEBERG LAW FIRM, PLLC
4 Imperial Oaks
San Antonio, TX 78248
210-695-6684 (Tel)
210-598-7357 (Fax)
ron@smeberg.com
PROPOSED ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2023, true and correct copies of the foregoing motion will be forwarded electronically via the Court's ECF System, or by U.S. first class mail, postage prepaid, on, all parties listed on the attached Service List.

/s/ Ronald J. Smeberg
RONALD J. SMEBERG

SERVICE LIST

DEBTOR

Entrada Development, LLC
c/o Michael Dixon
6 Candleleaf Ct., TX 78738

Texas Comptroller of Public Account
Attn: Bankruptcy
P.O. Box 149359
Austin, TX 78714-9359

GOVERNMENTAL ENTITIES

Office of the United States Trustee – AU12
903 San Jacinto Blvd Ste 230
Austin, TX 78701-2450

U.S. Attorney
Attn: Bkcy Division
700 E. San Antonio, Suite 200
El Paso, Texas 79901

Internal Revenue Services
Special Procedures Branch
300 E. 8th St. STOP 5026 AUS
Austin, TX 78701

Travis County Tax Assessor
General Correspondence
Po Box 1748
Austin, TX 78767-1748

NOTICE PARTIES

Velocity Mortgage
c/o McCalla Raymer Leibert Pierce, LLC
1320 Greenway Dr Ste 780
Irving, TX 75038-2550

SECURED CREDITORS

Velocity Mortgage
7000 N Mopac Expy
Austin, TX 78731-3027

UNSECURED CREDITORS

Pedernales Electric Cooperative
1949 W Whit

estone Blvd
Cedar Park, TX 78613-7200